

CW# 17-119

UNITED STATES DISTRICT COURT

for the

Eastern District of Pennsylvania

United States of America

v.

KENNETH REYES

Case No.

17-1619-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 11/20/17 to 12/3/2017 in the county of Philadelphia in the
Eastern District of Pennsylvania, the defendant(s) violated:

Code Section

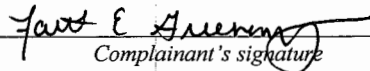
Offense Description

18 U.S.C. Section 2113(a)

Bank robbery and attempted bank robbery

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.


Complainant's signature

Faith E. Greenawalt, Special Agent, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: 12/6/17


Judge's signature

City and state: Philadelphia, PA

Hon. Elizabeth T. Hey, United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Faith E. Greenawalt, being duly sworn under oath and deposed, state the following:

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI") assigned to the Philadelphia, Pennsylvania Division, and have been so since July 2013. I am currently assigned to the Violent Crimes Task Force (VCTF) which investigates violations of Federal law, to include robberies of banks, robberies of businesses that affect interstate commerce (also known as Hobbs Act robberies), kidnappings, and fugitives. Previously, I was assigned to the Counterintelligence Squad where I investigated counter proliferation, among other criminal violations.

2. This affidavit is being submitted in support of a criminal complaint and arrest warrant charging KENNETH REYES, date of birth (DOB) April 2, 1974, with bank robbery and attempted bank robbery, in violation of Title 18, United States Code, Section 2113(a).

Citizens Bank, 1234 Market Street, Philadelphia, PA

3. On Monday, November 20, 2017, at approximately 2:10 p.m., an unknown black male ("suspect") robbed the Citizens Bank, 1234 Market Street, Philadelphia, PA. The suspect entered the bank branch, approached the victim teller (N.C.) and handed the victim teller a threatening demand note that stated, "STAY-CALM, ACT-NORMAL, EMPTY the CASH dRAWeR, NO-Dye-PACKS, NO-GPS, NO-ALARMS, DON'T CAUSE NO-One to GeT HURT, NO-DYE-PACK, NO-GPS, ALL the MONeY, \$100's, \$50's, & 20's. YOU GOT TEN-SeCONDS." The demand note also contained some Arabic handwriting. The victim teller complied with the suspect's demands and provided the suspect with approximately \$1,534.95 United States currency (USC). The suspect took the money, left the bank and fled in an unknown direction.

4. The suspect was described as a light-skinned black male, approximately 5'2" to 5'5" in height, medium build, early to mid 40s in age, short facial hair, light eyes, wearing a dark hooded sweatshirt, black puffy vest, blue jeans, and a grey and black baseball cap. The suspect was also described as having some skin discoloration on his face.

5. After the robbery, Philadelphia Police Department officers and members of the Philadelphia Division VCTF responded to the crime scene for processing where they interviewed witnesses, obtained surveillance footage and recovered the original demand note.

6. On November 22, 2017, investigators presented a photo array of six black males, each photo shown individually, to N.C., the victim teller, who positively identified KENNETH REYES as the individual who robbed him/her on November 20, 2017.

Wells Fargo Bank, 2005 Market Street, Philadelphia, PA

7. On November 24, 2017, at approximately 1:39 p.m., an unknown black male ("suspect") entered the Wells Fargo Bank at 2005 Market Street, Philadelphia, PA, approached the victim teller (P.A.) and handed the teller a threatening demand note that stated, "GIVE ME 100's and 50's, DON'T HIT ALARM." The victim teller complied with the suspect's demands and gave the suspect approximately \$457.00 USC. The suspect took the money and the demand note and he fled from the bank across Market Street into a dark colored two door vehicle, possibly a Mitsubishi or Pontiac, with a partial registration possibly ending in '7616.'

8. The suspect was described as a black male, dark complexion, approximately 5'8" in height, husky build, approximately 30's in age, wearing a red hooded sweatshirt and tan pants.

9. After the robbery, Philadelphia Police Department officers responded to the crime scene for processing where they interviewed witnesses and obtained the video surveillance footage.

10. On November 24, 2017, investigators presented a photo array of six black males, each photo shown individually, to P.A., the victim teller, who positively identified KENNETH REYES as the individual who robbed him/her on November 24, 2017.

Bank of America, 3745 Aramingo Ave., Philadelphia, PA

11. On Sunday, December 3, 2017, at approximately 1:20 p.m., an unknown black male ("suspect") attempted to rob Bank of America, 3745 Aramingo Avenue, Philadelphia, PA. The suspect entered the bank branch, approached the victim teller (K.N.) and handed the teller a threatening demand note that stated, "Put \$5,000 IN HUNDREDS, FIFTY's & twenty's IN bAg, NO-dye-PAK, NO-GPS, YOU Got 30-SeCONDs, NO-ALARMS, OR Else...NO dYe-PAK." There was also a picture of a gun at the bottom of the demand note. The victim teller did not comply with the suspect's demands, stepped away from the teller counter per Bank of America's "walk away" policy, and ran to the back room. The suspect then left the bank branch and fled through the parking lot and down the railroad tracks toward Aramingo Avenue.

12. The suspect was described as a light-skinned black male, approximately 5'6" in height, approximately 175-180 in weight, with no facial hair, wearing a black hooded sweatshirt, grey sweatpants, and red baseball cap.

13. After the robbery, Philadelphia Police Department officer responded to the crime scene for processing where they interviewed witnesses, obtained video surveillance footage and recovered the original demand note.

14. The officers reviewed the video surveillance footage of the robbery and observed the suspect exiting the bank, which is located inside a Shoprite at 3745 Aramingo Avenue, and fleeing across the parking lot. Officers also observed the fleeing suspect discard the clothing he

wore during the bank robbery (black hooded sweatshirt, grey sweatpants, and red hat) as he approached the train tracks behind the Shoprite.

15. A physical description of the suspect and his new clothing, a light blue long sleeved shirt, blue jeans, and white sneakers, was broadcast over police radio in the area.

16. Philadelphia Police officers surveyed the area of Aramingo Avenue and observed a male matching the physical description and new clothing of the bank robber walking westbound on 2100 E. Butler Street, Philadelphia, PA. Officers stopped and detained the male, later identified as KENNETH REYES, for further investigation. While in custody, KENNETH REYES stated, "Don't you know who I am, don't you watch the fucking news!" KENNETH REYES also told the officers he was wanted by the "feds" (federal agents).

17. Philadelphia Police Department officers then transported the Bank of America victim teller, K.N., to 2100 E. Butler Street, Philadelphia, PA, where s/he positively identified KENNETH REYES as the individual who attempted to rob Bank of America at 3745 Aramingo Avenue, Philadelphia, PA, earlier that day.

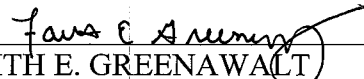
18. KENNETH REYES was then transported to East Detectives Division for further investigation. After being advised of and voluntarily waiving his *Miranda* rights, KENNETH REYES made a tape-recorded confession to his commission of the November 20, 2017 robbery of Citizens Bank at 1234 Market Street, Philadelphia, PA, the November 24, 2017 robbery of Wells Fargo Bank at 2005 Market Street, Philadelphia, PA, and the December 3, 2017 attempted bank robbery of Bank of America at 3745 Aramingo Avenue, Philadelphia, PA.

19. A criminal database search showed that KENNETH REYES is currently serving 12-year PA back time parole for robbery, aggravated assault and firearms offenses.

20. Additionally, I have compared photos and other information from various databases of the physical appearance of KENNETH REYES with the physical descriptions of the robbery suspects provided by bank employees from the victim banks and I believe that KENNETH REYES matches the physical descriptions provided by the bank employees at each bank.

21. The accounts of Citizens Bank, Wells Fargo Bank, and Bank of America are each insured by the Federal Deposit Insurance Corporation (FDIC) and they were insured by the FDIC at the time of the above-described robberies and attempted robbery.

22. Based on these facts, I submit there is probable cause to charge KENNETH REYES with: (a) the November 20, 2017 robbery of Citizens Bank, 1234 Market Street, Philadelphia, PA; (b) the November 24, 2017 robbery of Wells Fargo Bank, 2005 Market Street, Philadelphia, PA; and, (c) the December 3, 2017 attempted bank robbery of Bank of America, 3745 Aramingo Avenue, Philadelphia, PA, each in violation of Title 18, United States Code, Section 2113(a).



FAITH E. GREENAWALT
Special Agent
Federal Bureau of Investigation

Sworn to before me
this 6th day of December, 2017



HONORABLE ELIZABETH T. HEY
United States Magistrate Judge